

# EXHIBIT 6

1           IN THE UNITED STATES DISTRICT COURT FOR THE  
2                           WESTERN DISTRICT OF MISSOURI

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3  
4 JOSHUA GLASSCOCK, on  
5 behalf of himself and all  
6 others similarly situated,

7           Plaintiffs,

8 vs.

Case No.  
22-CV-3095-SRB

9 SIG SAUER, INC.,

10          Defendant.

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13  
14                           VIDEOTAPE DEPOSITION OF:

15                           MATT FARKAS

16  
17                   Taken on behalf of the Plaintiffs

18                           September 23, 2024

19                           Commencing at 10 a.m.

20  
21  
22  
23                           LEXITAS

24                           www.Lexitas.com

25                           Amy J. Schreck, LCR  
                          Knoxville, Tennessee  
                          (865) 329-9919

10:55 1 meeting?

2 A. Yes.

3 Q. What did he share with you?

4 A. That the two main wants or desires from  
10:55 5 the attendees was that the striker fired pistol  
6 that we developed did not have to involve a  
7 trigger press for disassembly and it had a more  
8 tactile trigger press and an audible reset.

9 Q. Anything else?

10:55 10 A. No.

11 Q. We're going to -- I know you're not an  
12 engineer at SIG. Correct?

13 A. That is correct.

14 Q. Okay. So to ask you a bunch of detailed  
10:55 15 engineering questions, not your topic.

16 You're not here to talk about that.

17 Right?

18 A. That's correct.

19 Q. So we're talking really broad views for  
10:56 20 just somebody who may be reading this transcript.

21 A. Okay.

22 Q. When you say that you don't have to press  
23 the trigger to disassemble, briefly describe for  
24 whoever may read what that means.

10:56 25 A. So, many of our competitor pistols in

02:31 1 I think what came up most during the LEVUP as far  
2 as the drop safety but typically I don't recall  
3 it ever coming out outside that.

4 Q. Has SIG Sauer ever had a law enforcement  
02:32 5 agency ask for a tab trigger on a P320?

6 A. Not that I recall. I don't recall  
7 although it was an option -- and actually I'm  
8 going to take that back. Royal Canadian Mounted  
9 Police when they issue their RFI, the tab trigger  
02:32 10 was included and later it was taken out of the  
11 RFP.

12 Q. Anyone else other than the Mounties?

13 A. Not that I recall ever hearing.

14 Q. If somebody asked for one, could you sell  
02:33 15 them a gun with a tab trigger?

16 MR. GIBSON: Object to form.

17 THE WITNESS: Once again, we have the  
18 capabilities to do a lot. Right?

19 BY MR. WERTS:

02:33 20 Q. On the law enforcement guns, is the manual  
21 safety an option?

22 A. Yes.

23 Q. Is it an option on every size P320?

24 A. So, I know it's an option in the carry in  
02:33 25 the full size. I don't know about the compact.

02:33 1 Q. But the carry size can come with the  
2 optional manual safety?

3 A. Yes.

4 Q. Does SIG Sauer ever receive any  
02:34 5 communication from a law enforcement agency, Hey,  
6 I don't want a manual safety on my guns?

7 A. That they don't want it?

8 Q. Yep.

9 A. I don't recall ever seeing anything like  
02:34 10 that.

11 Q. Are there some departments that want the  
12 manual to be optional manual safety?

13 A. I've never had one ask for it.

14 Q. We talked a little bit earlier about the  
02:35 15 manual that comes with the P320.

16 Do you recall that?

17 A. Yes.

18 Q. And I believe you indicated that the law  
19 enforcement models come with the same manual as  
02:35 20 would be sold for the consumer version. Correct?

21 A. I'm assuming it does.

22 Q. And that the same statements are made to  
23 law enforcement folks about the safety  
24 characteristics of the P320 as were made to the  
02:36 25 consumers. Correct?

## REPORTER'S CERTIFICATE

STATE OF TENNESSEE

COUNTY OF ROANE

I, Amy J. Schreck, Licensed Court Reporter, with offices in Knoxville, Tennessee, hereby certify that I reported the foregoing deposition of MATTHEW FARKAS by machine shorthand to the best of my skills and abilities, and thereafter the same was reduced to typewritten form by me. I am not related to any of the parties named herein, nor their counsel, and have no interest, financial or otherwise, in the outcome of the proceedings.

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